

HARRIS
ST. LAURENT

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
ELECTRONICALLY FILED
DOC #: 19-cr-437-AKH
FILED: 10/14/2020
October 9, 2020

*So ordered
10-14-20
Alv. K. Hellerstein*

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated September 15, 2020 (Docket No. 81), I write to update the Court regarding Mr. Lawrence's continued efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Since our last update to the Court on September 15, 2020, Mr. Lawrence is still in the process of contacting one more potential co-signer. Mr. Lawrence continues to use his best efforts to secure a third co-signer.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to an additional two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than October 23.

Respectfully,

Andrew St. Laurent
Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)